

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Case No. 14-03104-CR-S-RK</b>
<b>v.</b>	)	
	)	
<b>SCOTT GOODWIN-BEY,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION FOR EXTENSION OF TIME IN WHICH TO SUBMIT A RESPONSE  
TO DEFENDANT'S MOTION TO SUPPRESS**

Comes now the United States of America, by and through its undersigned counsel, and moves the Court for a fourteen day enlargement of time to submit its response to defendant's Motion to Suppress for the following reasons:

1. Undersigned counsel, in the last two weeks, has handled multiple 2255 petitions, and completed the Government's responses in *Pulliam v. United States*, case no. 15-2310, and *Johnson v. United States*, case no. 15-03514-CV-S-MDH-P.
2. Counsel was scheduled to represent the Government in *Landsdown v. United States*, case no. 15-03100-CV-S-MDH, a hearing on a 2255 petition, on January 19, 2016. Preparation for said hearing was extremely time-consuming.
3. Counsel prepared and will present multiple indictments to the January 2016 session of the Grand Jury.
4. Counsel continues to suffer from a lingering illness.

5. Counsel assures the Court that this requested enlargement of time is not sought to hinder or delay this matter, and will not result in prejudice to the defendant.

WHEREFORE, for all the foregoing reasons, the United States respectfully requests that an enlargement of time to and including Tuesday, February 2, 2016, be granted in which to submit a response to defendant's Motion.

Respectfully submitted,

Tammy Dickinson  
United States Attorney

By: /s/James J. Kelleher  
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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was delivered on January 19, 2016, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

*/s/ James J. Kelleher*

James J. Kelleher

Assistant United States Attorney